

United States District Court  
Western District of New York

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United States of America,

*Plaintiff*

vs

Motion for Admission Pro Hac Vice  
Indictment № 10-CR-307

Anthony Galea,

*Defendant*

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Mark J. Mahoney, an attorney admitted to practice before this Court and all federal districts in New York State, having given notice of his appearance in this matter, as counsel for the accused, hereby moves for the Admission *Pro Hac Vice* of Brian Greenspan, Barrister, of Toronto, Ontario, pursuant to Local Rule 83.1(I), as co-counsel. The undersigned attorney is a member in good standing of this Court, and is hereby designated as lead-counsel for this applicant.

Dated: July 6, 2011

Respectfully submitted,  
/s/ Mark J. Mahoney

Mark J. Mahoney, Esq.  
HARRINGTON & MAHONEY  
70 Niagara Street, 3<sup>rd</sup> Floor  
Buffalo, NY 14202-3407  
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(Attorneys for Anthony Galea)

United States District Court  
Western District of New York

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United States of America,

*Plaintiff*

vs

Anthony Galea,

*Defendant*

Affirmation of Brian H. Greenspan in  
Support of Motion for Admission Pro Hac  
Vice

Indictment № 10-CR-307

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Brian H. Greenspan, affirms to be true and states under penalty of perjury as follows:

1. Pursuant to Local Rules Section 83.1(b), the Affiant provides the following information in support of the Motion for Admission Pro Hac Vice.

2. My residence address is 40 Tranby Ave., Toronto, Ontario; my office address is 15 Bedford Rd., Toronto, Ontario.

3. I attended the University of Toronto and graduated in 1968 with a B.A. degree. I then attended and graduated with a bachelor's of laws (LIB) degree in 1971 from Osgoode Hall Law School. I received my LLM from the London School of Economics in 1972.

4. I was admitted to practice law in the Province of Ontario in 1974.

5. I have never been held in contempt of court or censured in any disciplinary proceedings nor has he been suspended or disbarred by any court nor admonished by any disciplinary committee of the organized bar.

6. I am familiar with the provisions of the Judicial Code, 28 U.S.C. §§ 1330-1452, which pertain to jurisdiction of and venue in a United States District Court; The Federal Rules of Civil Procedure; The Federal Rules of Criminal Procedure; The Federal Rules of Evidence; and have read and will read provisions pertinent to my appearance in this matter. I have been provided and have reviewed The Local Rules of Practice for the United States District Court for the Western District of New York; The Revised Plan for the Prompt Disposition of Criminal Cases for the Western District of New York; The New York State Lawyer's Code of Professional Responsibility as adopted from time to time by the Appellate Divisions of the State of New York, and as interpreted and applied by the United States

Supreme Court, the United States Court of Appeals for the Second Circuit, and this court; and The Civility Principles of the United States District Court for the Western District of New York.

7. I agree to adhere faithfully to the New York State Lawyer's Code of Professional Responsibility as adopted from time to time by the Appellate Divisions of the State of New York

8. I have been in private practice for 37 years and specialize in criminal defense. I have been "AV Rated," the highest rating in legal ability and ethical standards, by Martindale-Hubbell since 1985.

WHEREFORE it is respectfully requested that the Court grant this Motion to Appear Pro Hac Vice and allow Brian H. Greenspan to represent defendant Anthony Galea for all matters and trial in the above styled cause.

Dated: July 6, 2011

Respectfully submitted,  
/s/ Brian H. Greenspan

Brian H. Greenspan, Barrister  
GREENSPAN HUMPHREY LAVINE

Ph: 416-868-1755  
Fac: 416-868-1990

*(Attorneys for Anthony Galea)*

United States District Court  
Western District of New York

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United States of America,

*Plaintiff*

vs

Anthony Galea,

*Defendant*

Affirmation of Mark J. Mahoney in  
Support of Motion for Admission Pro Hac  
Vice  
Indictment № 10-CR-307

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Mark J. Mahoney, affirms to be true and states under penalty of perjury as follows:

1. I reside at 302 Middlesex Road, Buffalo, New York 14216 and maintain an office for the practice of law at 70 Niagara Street, 3<sup>rd</sup> Floor, Buffalo, New York 14202.

2. I am an attorney at law, admitted to practice in the New York State Court, Appellate Division, Third Department on February 18, 1975. I was admitted to practice in the United States District Court for the Western District of New York on the 24<sup>th</sup> day of February, 1975.

3. I have known Brian Greenspan for over 20 years, through our involvement with the Criminal Lawyer's Association in Canada, numerous cases in which we represented defendants on both sides of the border, and socially.

4. I know Brian Greenspan to be of the highest moral character. He is well regarded by other criminal defense attorneys and is known as one of the most preeminent attorneys in Canada. He is well qualified to be admitted to practice in this Court, as supported by his attached *curriculum vitae*.

WHEREFORE it is most respectfully requested that this Honorable Court grant this Motion to Appear Pro Hac Vice and allow Brian Greenspan to represent defendant Anthony Galea for all matters and trial in the above styled cause.

Dated: July 6, 2011

/s/ Mark J. Mahoney

Mark J. Mahoney, Esq.  
HARRINGTON & MAHONEY  
70 Niagara Street, 3<sup>rd</sup> Floor  
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United States District Court  
Western District of New York

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United States of America,

*Plaintiff*

v.

**Certificate of Service**

Docket № 1:10-cr-00307-RJA-HBS

Anthony Galea,

*Defendant*

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Ivonne DeLuca, a Legal Assistant with the office of Harrington & Mahoney, located at 70 Niagara Street, 3<sup>rd</sup> Floor, Buffalo, NY 14202-3407 affirm to be true and state under penalty of perjury that on July 6, 2011 the **Motion for Admission Pro Hac Vice** was electronically filed with the Clerk of the District Court using its CM/ECF system, which would then electronically notify the following CM/ECF participants on this case:

1. Paul Campana, AUSA

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/s/ Ivonne DeLuca

Ivonne DeLuca

Sworn before me this

6th day of July, 2011

/s/ Ian M. Harrington

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Ian M. Harrington, Notary Public

Qualified in Erie County

My Commission Expires 4/19/2014